

Exhibit 20



June 28, 2024

Bonita L. Robinson
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By Email

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**Re: Apparent Deficiencies in SaveOnSP's Document Productions
Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC,
Case No. 2:22-cv-02632 (JKS) (CLW)**

Dear Meredith:

We write regarding several apparent deficiencies in SaveOnSP's productions to date, and to request that SaveOnSP designate Leslie Kauffman as a document custodian.

First, SaveOnSP has produced several documents that expressly refer to e-mails or other communications that SaveOnSP has not produced, but that plainly are relevant to SaveOnSP's efforts to evade or avoid detection by drug manufacturers and are thus responsive to JJHCS's requests for production. *See* JJHCS No. 79 (seeking "All documents relating to any attempts by SaveOnSP to evade or avoid detection of the SaveOnSP Program by drug manufacturers"). For example:

- SaveOnSP has produced individual messages comprising a Teams conversation in which [REDACTED]
[REDACTED]
[REDACTED] *See* SOSP_1032197; SOSP_2056606; SOSP_2056608; SOSP_2056610; SOSP_2056613; SOSP_2056617; SOSP_2056619. The conversation includes a message from [REDACTED]
[REDACTED] SOSP_2056631. We have not found the email from [REDACTED] in SaveOnSP's productions to date. Please produce this email and all related documents and communications. If the email has already been produced, please identify it by Bates number.

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- SaveOnSP has produced Teams messages from [REDACTED] SOSP_2158575; SOSP 2158587. Please confirm that you will produce all calls that Ms. Zulqarnain [REDACTED]¹ These call recordings are squarely responsive to JJHCS's RFP No. 79, and, to the extent the calls were with JJHCS, are also responsive to at least JJHCS's RFP Nos. 6 and 114.²

Second, these materials also demonstrate that SaveOnSP employee Leslie Kauffman is key to central issues in this case—and in particular, played a central role in SaveOnSP's efforts to evade detection by drug manufacturers—and must be added as a custodian. For example, [REDACTED]

SOSP 1034492.

Id. Moreover, [REDACTED]

SOSP 1034493. Similarly, [REDACTED]

[REDACTED] SOSP_0786717. However, SaveOnSP has not made Ms. Kauffmann a custodian, and we have not found any emails or messages [REDACTED] in SaveOnSP's productions to date. Please confirm that you will add Ms. Kauffmann as a custodian and produce all such emails and messages to Ms. Kauffman and all related documents and communications relating to those emails and messages. If these communications have already been produced, please identify them by Bates number.

Third, SaveOnSP has produced several documents [REDACTED]

See SOSP 1346903 [REDACTED]

[REDACTED]; *see also, e.g.*, SOSP_1035742; SOSP 1037895; SOSP 1066393. Please produce all documents and communications regarding [REDACTED] training material, or manufacturer [REDACTED]

¹ As SaveOnSP is aware, JJHCS has served a request for production specifically concerning these recordings. *See* JJHCS RFP No. 130. However, the recordings should have been produced in connection with JJHCS's prior requests and JJHCS requests prompt production of the same.

² JJHCS understands that at present, SaveOnSP refuses to search for or produce documents in response to RFP No. 114 on the ground that the Request is duplicative of RFP Nos. 6 and 79. JJHCS reserves all rights with respect to RFP No. 114, including its right to move to compel production in response to this request.

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terms and conditions, including participant lists, associated emails, agendas, meeting minutes, and calendar invitations.

We request a response by July 9, 2024.

Very truly yours,

/s/ Bonita Robinson
Bonita L. Robinson